

IN THE UNITED STATES DISTRICT COURT
For the Southern District of California

SECURITIES AND EXCHANGE
COMMISSION
Plaintiff,

v.

JAMES E. FRANKLIN,
Defendant.

Case No. 02cv84 DMS (RBB)

**NOTICE OF NON-STIPULATION TO PLAINTIFF'S MOTION FOR
CONTINUANCE OF HEARING DATE**

1. Defendant James E. Franklin hereby notifies the Court that he does **not stipulate** to Plaintiff Securities and Exchange Commission's Motion to Continue the Hearing Date on Defendant's pending Rule 60(b) Motion and Motion to Vacate Penny Stock Bar (ECF No. 489).
2. Although Plaintiff SEC reached out by email on May 20, 2025, to solicit Defendant's position, Defendant was unavailable due to a scheduled medical appointment and did not receive the communication until the morning of May 21. By that time, Plaintiff had already filed its Motion for Continuance—less than 24 hours after outreach—without affording Defendant a meaningful opportunity to respond or confer.
3. Defendant is disappointed that the Commission proceeded unilaterally rather than engaging in reciprocal dialogue. Defendant advised SEC counsel on May 21 that he would be willing to consider a one-week continuance **only if the SEC agreed to promptly initiate good-faith settlement discussions**, which would reflect mutual

1 cooperation and fairness given the long procedural history of the case and the equities
2 now at issue.

3 4. To date, Plaintiff has not agreed to those terms, and thus **no stipulation exists**.

4 5. Accordingly, Defendant will file a Limited Opposition to the Motion for Continuance and
5 respectfully defers to the Court on whether the SEC has demonstrated sufficient cause for
6 its requested extension.

7
8 Respectfully submitted,

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10 Dated: May 20, 2025

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14 **James E. Franklin**
15 Defendant, Pro Se
16 1212 H Street, No. 125
17 Ramona, CA 92065
18 jayvonfrank@gmail.com
19 (720) 771-0140
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2 **IN THE UNITED STATES DISTRICT COURT**
For the Southern District of California

3 **SECURITIES AND EXCHANGE**
4 **COMMISSION**
5 **Plaintiff,**

6 **v.**

7 **JAMES E. FRANKLIN,**
8 **Defendant.**

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)
) **Case No. 02cv84 DEM (RBB)**
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9 **CERTIFICATE OF MAILING**

10 I, **James E. Franklin**, declare that on **May 20th, 2025**, I caused true and correct copies of the
11 following document:
12

13 **1. NOTICE OF NON-STIPULATION TO PLAINTIFF'S MOTION FOR**
14 **CONTINUANCE OF HEARING DATE**

15
16 **Clerk of the Court**

17 U.S. District Court – Southern District of California
333 West Broadway, Suite 420
San Diego, CA 92101

18 **James P. Connor, Esq.**

19 Securities and Exchange Commission
20 Los Angeles Regional Office
444 S. Flower Street, Suite 900
Los Angeles, CA 90071
21 Email: connorja@sec.gov (*copy also sent by email as courtesy*)

22 **Department of Justice – Civil Division**

23 Federal Programs Branch
1100 L Street NW
24 Washington, DC 20005
25
26
27
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2
3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on this 20th day of May 2025
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8 **James E. Franklin**

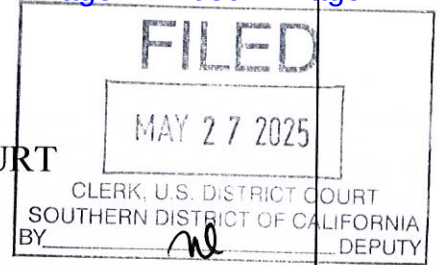
9 Defendant, Pro Se

10 1212 H Street, #125

11 Ramona, CA 92065

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IN THE UNITED STATES DISTRICT COURT

For the Southern District of California

SECURITIES AND EXCHANGE
COMMISSION
Plaintiff,

v.

JAMES E. FRANKLIN,
Defendant.

Case No. 02cv84 DMS (RBB)

**NOTICE OF LODGMENT OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF
MOTION FOR RELIEF FROM JUDGMENT (FRCP 60(b))**

1. Defendant James E. Franklin hereby lodges the following document in support of the pending Rule 60(b) motion:
2. **Exhibit 1:** Declaration of **Adina Lawson**, dated May 19, 2025, confirming the authenticity of Exhibits F–H submitted with the original motion (letters authored by Stephan Jan Meyers).

Respectfully submitted,

Dated: May 20th, 2025


James E. Franklin
Pro Se Defendant
1212 H Street, SPC #125
Ramona, CA 92065
jayvonfrank@gmail.com

EXHIBIT 1

DECLARATION OF ADINA LAWSON

(In Support of Motion for Relief from Judgment – Fed. R. Civ. P. 60(b))

I, **Adina Lawson**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the surviving spouse of **Stephan Jan Meyers**, a former attorney and enforcement official with the U.S. Securities and Exchange Commission. My husband passed away on **March 8, 2025**.
2. I was married to Stephan from **2012 until his death in 2025**, and I was closely familiar with his handwriting, professional work habits, and correspondence style throughout our marriage.
3. I have reviewed the following documents attached to Mr. James E. Franklin's motion for relief:
 - A letter dated **March 11, 2004**, addressed to the Director of Enforcement at the SEC.
 - A letter and supplemental memorandum dated **June 29, 2007**, addressed to the SEC Commissioners.
4. I personally recognize the handwriting, language, formatting, and authorship of these documents as consistent with my husband's legal writing and professional voice.
5. I recall my husband discussing Mr. Franklin's case at length during our marriage. He often expressed frustration with how the matter was handled and was especially troubled by what he saw as misconduct or abuse of discretion by the SEC's trial team.
6. In February 2025, shortly before his death, Stephan told me that he had recently spoken to Mr. Franklin and encouraged him to revisit the case. He was hopeful that recent changes in law and increased attention to SEC misconduct would allow Mr. Franklin an opportunity to obtain post-judgment relief.
7. I make this declaration to support the authenticity and admissibility of my husband's writings.
8. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 19th day of May, 2025
at Palm Desert, California.



Adina Lawson

IN THE UNITED STATES DISTRICT COURT
For the Southern District of California

SECURITIES AND EXCHANGE

COMMISSION

Plaintiff,

v.

JAMES E. FRANKLIN,

Defendant.

Case No. 02cv84 DEM (RBB)

CERTIFICATE OF MAILING

I, **James E. Franklin**, declare that on **May 20th, 2025**, I caused true and correct copies of the following document:

**NOTICE OF LODGMENT OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF
MOTION FOR RELIEF FROM JUDGMENT (FRCP 60(b))**

Clerk of the Court

U.S. District Court – Southern District of California
333 West Broadway, Suite 420
San Diego, CA 92101

James P. Connor, Esq.

Securities and Exchange Commission
Los Angeles Regional Office
444 S. Flower Street, Suite 900
Los Angeles, CA 90071

Department of Justice – Civil Division

Federal Programs Branch
1100 L Street NW
Washington, DC 20005

1
2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on this 20th day of May 2025

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5
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7 **James E. Franklin**

8 Defendant, Pro Se

9 1212 H Street, #125

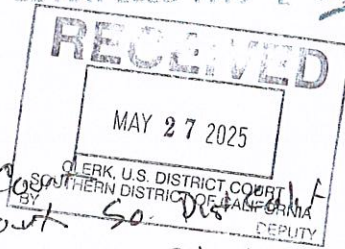
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Removal Ct 92065

TAMPA FL 335
SAINT PETERSBURG FL
22 MAY 2025 PM 7 L



Clerk of Court
US Dist Court So. District
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San Diego, CA 92101

92101-380620

